



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY

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October 26, 2005

SENT BY E-Mail, and  
First Class U.S. Mail

Meabh Purcell, Esq.  
LeBoeuf, Lamb, Green & MacRae LLP  
260 Franklin Street  
Boston, MA 02110-3173

Re: Fitchburg Gas and Electric Light Company, D.T.E. 05-64

Dear Ms. Purcell:

Enclosed is the third set of information requests by the Department of Telecommunications and Energy to Fitchburg Gas and Electric Light Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., November 2, 2005.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel  
Hearing Officer

Enc.  
cc: Mary Cottrell, Secretary

THIRD SET OF INFORMATION REQUEST OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY  
D.T.E. 05-64

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Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Fitchburg Gas and Electric Light Company ("Fitchburg" or "Company") the following information request(s).

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List in D.T.E. 04-48, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

### **Requests**

DTE 3-1 Please refer to the Company's response to Information Request DTE-1, part (d).

- (a) Do prepaid pension balances arise when contributions to the pension plan exceed SFAS No. 87 pension expense? Conversely, do prepaid pension balances reverse when SFAS No. 87 pension expense exceeds plan contributions?
- (b) Do pension liabilities arise when SFAS 87 pension expense exceeds contributions to the pension plan? Do pension liabilities reverse when contributions to the pension plan exceed SFAS 87 pension expense?
- (c) Given that Unitil Energy Systems and Fitchburg customers provided the funds which gave rise to the prepaid pension balances, please explain the rationale for transferring those balances to the Service Company. Discuss whether it would be appropriate to use the prepaid balances supplied by utility customers for the sole purpose of reducing future contributions attributable to remaining utility employees.
- (d) Since the Service Company has a pension liability without any transfer of prepaid pension balances, can it be inferred that the pension liability would exist with or without the transferred employees? Is it the Company's position that the Service Company pension liability is attributable to the transferred employees only?
- (e) Given that there is one defined benefit plan for Unitil Corporation, why do utility contributions to the pension plan exceed SFAS 87 pension expense, while Service Company SFAS 87 expense exceeds contributions?